

1 **BATHAEE DUNNE LLP**  
2 Yavar Bathaee (CA 282388)  
3 Andrew C. Wolinsky (CA 345965)  
4 445 Park Avenue, 9th Floor  
5 New York, NY 10022  
6 Tel.: (332) 322-8835  
7 yavar@bathaeedunne.com  
8 awolinsky@bathaeedunne.com

9 **BATHAEE DUNNE LLP**  
10 Brian J. Dunne (CA 275689)  
11 Edward M. Grauman (admitted *pro hac vice*)  
12 901 S. MoPac Expressway  
13 Barton Oaks Plaza I, Suite 300  
14 Austin, TX 78746  
15 Tel.: (213) 462-2772  
16 bdunne@bathaeedunne.com  
17 egrauman@bathaeedunne.com

18 *Interim Co-Lead Counsel for the Advertiser  
19 Classes*

20 **SCOTT+SCOTT ATTORNEYS AT LAW  
21 LLP**

22 Amanda F. Lawrence (admitted *pro hac vice*)  
23 Patrick J. McGahan (admitted *pro hac vice*)  
24 Michael P. Srodoski (admitted *pro hac vice*)  
25 156 South Main Street, P.O. Box 192  
26 Colchester, CT 06415  
27 Tel.: (860) 537-5537  
28 alawrence@scott-scott.com  
pmcgahan@scott-scott.com  
msrodoski@scott-scott.com

29 **SCOTT+SCOTT ATTORNEYS AT LAW  
30 LLP**

31 Patrick J. Coughlin (CA 111070)  
32 Carmen A. Medici (CA 248417)  
33 Hal D. Cunningham (CA 243048)  
34 Daniel J. Brockwell (CA 335983)  
35 600 W. Broadway, Suite 3300  
36 San Diego, CA 92101  
37 Tel.: (619) 233-4565  
38 pcoughlin@scott-scott.com  
cmedici@scott-scott.com  
hcunningham@scott-scott.com  
dbrockwell@scott-scott.com

39 **UNITED STATES DISTRICT COURT  
40 NORTHERN DISTRICT OF CALIFORNIA  
41 SAN FRANCISCO DIVISION**

42 MAXIMILIAN KLEIN, et al.,

43 Case No. 3:20-cv-08570-JD

44 Plaintiffs,

45 Hon. James Donato

46 vs.

47 **DECLARATION OF MICHAEL A.  
48 WILLIAMS, PH.D.**

49 META PLATFORMS, INC.,

50 Defendant.

1 I, Michael A. Williams, Ph.D., declare and state as follows:

2 1. I am a Managing Director at Berkeley Research Group, LLC. I received my M.A.  
3 and Ph.D. degrees in economics from the University of Chicago. I have been retained as an  
4 economic consultant by the U.S. Department of Justice, Antitrust Division, the U.S. Federal Trade  
5 Commission, and the Canadian Competition Bureau. I have personal knowledge of the facts set  
6 forth in this declaration and, if called as a witness, could and would testify competently to such facts  
7 under oath.

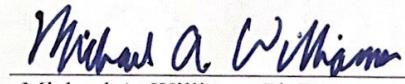
8 2. I have been asked by counsel for Advertiser Plaintiffs in the above-captioned  
9 litigation to provide certain expert opinions in connection with Advertiser Plaintiffs' motion for  
10 class certification.

11 3. Attached hereto are the two reports I have prepared in connection with this  
12 assignment: the Expert Report of Michael A. Williams, Ph.D., (**Exhibit A**) and the Reply Report of  
13 Michael A. Williams. Ph.D., (**Exhibit B**).

14 4. The attached reports accurately reflect my opinions on the matters contained therein.

15  
16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on 9/14/23, in Walnut Creek, CA

18  
19   
20 Michael A. Williams, Ph.D.

21  
22  
23  
24  
25  
26  
27  
28